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Hearing Date: August 10, 2022

Hearing Time: 10:00 a.m.

Opposition Date: June 6, 2022

Reply Date: July 6, 2022

Attorneys for the Union Securities Defendants

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant,

Adv. Pro. No. 08-01789 (cgm)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff Investment
Securities LLC,

Plaintiff,

v.

UNION SECURITIES INVESTMENT
TRUST CO., LTD., UNION USD GLOBAL
ARBITRAGE FUND, UNION USD GLOBAL
ARBITRAGE A FUND, and UNION
ARBITRAGE STRATEGY FUND,

Defendants.

Adv. Pro. No. 12-01211 (CGM)

ORAL ARGUMENT REQUESTED

**NOTICE OF HEARING ON UNION
SECURITIES DEFENDANTS' MOTION TO DISMISS**

PLEASE TAKE NOTICE that on April 4, 2022, defendants Union USD Global Arbitrage Fund (“Union Global Fund”), Union USD Global Arbitrage A Fund (“Union Global A Fund”), Union Arbitrage Strategy Fund (“Union Strategy Fund”, and collectively, the “Funds”), and Union Securities Investment Trust Co., Ltd. (“USITC,” and together with the Funds, the “Union Securities Defendants”), by and through their undersigned counsel, filed a motion (the “Motion”) for an order dismissing the Complaint filed by plaintiff Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff, pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6), as made applicable by Rule 7012 of the Federal Rules of Bankruptcy Procedure. The Motion will be heard before the Honorable Cecelia G. Morris, United States Bankruptcy Judge for the United States Bankruptcy Court, Southern District of New York, on **August 10, 2022 at 10:00 a.m. (prevailing Eastern Time)** (the “Hearing”), or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that pursuant to the Court’s directive, all hearings will be conducted remotely pending further Order of the Court. All parties who wish to participate in the Hearing must refer to Judge Morris’ guidelines for remote appearances and are required to make arrangements to appear via ZoomGov. For further details on ZoomGov, please call the Courtroom Deputy at (845) 451-6367. Further instructions regarding remote appearances via ZoomGov can be found on the Court’s website at <https://www.nysb.uscourts.gov/zoom-video-hearing-guide>.

PLEASE TAKE FURTHER NOTICE that if you oppose the relief requested in the Motion you are required to file a written response (“Response”), and to serve the Response on counsel for the Union Securities Defendants, Sheppard Mullin Richter & Hampton LLP, 30

Rockefeller Plaza, New York, NY 10112-0015, Attn: Michael T. Driscoll, mdriscoll@sheppardmullin.com, Blanka K. Wolfe, bwolfe@sheppardmullin.com, so that it is received by **June 6, 2022**. If a Response to the Motion is filed, the Union Securities Defendants shall file their reply by July 6, 2022.

Dated: New York, New York
April 4, 2022

By: /s/ Michael T. Driscoll

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